

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

Isis Navarro Reyes,

Defendant.

**Affirmation in Support of
Application for Order of
Continuance**

24 Mag. 01686

State of New York)
County of New York : ss.:
Southern District of New York)

Brandon C. Thompson, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Danielle Sassoon, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3161(h)(7)(A).

2. The defendant was charged in a complaint dated April 29, 2024, with violations of 21 U.S.C. §§ 353(b); 331(a); 331(c); 331(k) and 18 U.S.C. §§ 371; 545. The defendant was arrested on May 1, 2024, and was presented in this District before Magistrate Judge Barbara Moses on that same date, at which proceeding the defendant was represented by Zawadi Baharanyi, Esq., and ordered released on bail with certain conditions.

3. At the presentment on May 1, 2024, a preliminary hearing was scheduled for May 31, 2024, after defense counsel consented to extend the deadline within which to conduct a

preliminary hearing. Under the Speedy Trial Act, the Government had until May 31, 2024, within which to file an indictment or information. *See* 18 U.S.C. § 3161(b).

4. On June 5, 2024, the Honorable Jennifer E. Willis entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until June 30, 2024.

5. On July 1, 2024, the Honorable Katharine H. Parker entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until July 30, 2024.

6. On July 30, 2024, the Honorable Gary Stein entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until August 29, 2024.

7. On August 29, 2024, the Honorable Stewart D. Aaron entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until September 28, 2024.

8. On September 30, 2024, the Honorable Sarah Netburn entered an order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until October 28, 2024.

9. On October 28, 2024, the Honorable Barbara Moses entered an order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until November 27, 2024.

10. On November 25, 2024, the Honorable Barbara Moses entered an order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until December 27, 2024.

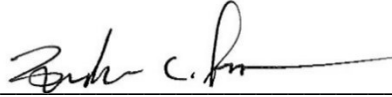
11. On December 23, 2024, the Honorable Sarah Netburn entered an order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until January 26, 2025.

11. Defense counsel and I have had discussions regarding a possible disposition of this case. The parties plan to continue our discussions, but do not anticipate a resolution before January 26, 2025.

12. Therefore, the Government requests a 30-day continuance until February 25, 2025, to continue the foregoing discussions toward resolving this matter. On January 21, 2025, I personally corresponded with defense counsel, who stated that the defendant consents to an extension of the preliminary hearing and Speedy Trial Act deadlines to February 25, 2025, and has specifically consented to this request. This application has been authorized by Assistant United States Attorney Andrew Dember, Deputy Chief of the Criminal Division.

13. For the reasons stated above, good cause supports the extension of the preliminary hearing deadline, and the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
January 21, 2025

A handwritten signature in black ink, appearing to read "Brandon C. Thompson", written over a horizontal line.

Brandon C. Thompson
Assistant United States Attorney
212-637-2444